

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE**

**IN RE: FELICIA FENTRESS**

**814 HANNUM STREET  
CLARKSVILLE TN 37040**

**CASE NO. 05-11509-GP3-13**

**SSN: (1) XXX-XX-6774 SSN: (2) XXX-XX-  
Debtors**

**OPPOSITION TO MOTION FOR RELIEF**

Comes Mark Podis, counsel for the debtors, for the above-captioned estate, and would state as follows:

1. The debtor does not have sufficient information at this time to admit or deny all of the statements made in the motion for relief.
2. The debtor is attempting to cure any material default in the case.
3. The property in question is necessary for the Debtor to be able to complete the bankruptcy.

WHEREFORE, PREMISES CONSIDERED, DEBTOR PRAYS:

1. That the Court deny the Movants request for relief.
2. Allow the bankruptcy case to go forward.
3. Allow debtors such other and further general relief as is just and proper.

Respectfully Submitted,  
/S/MARK PODIS  
Mark R. Podis (BPR #012216)  
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### **CERTIFICATE OF SERVICE**

I hereby certify that I have forwarded a true and exact copy of the foregoing Opposition has been delivered to the Chapter 13 Trustee, PO Box 190664, Nashville, TN 37219, to the U.S. Trustee, Suite 318, Customs House, 701 Broadway, Nashville, TN 37203, delivered to Mitzi Urquhart, PO Box 1315, Goodlettsville, TN 37072, Attorney for F & M Bank, mailed to the debtor, copies were also sent via CM/ECF @ <http://ecf.tnmb.uscourts.gov>., on this 10th day of January, 2006.

/S/MARK PODIS

Mark Podis